

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
v.)
JOSEPH WOLCOTT,)
a/k/a "Wildcat,")
Defendant.)
Deanna Wolcott, Petitioner.)

NO. 2:08-CR-00013
CHIEF JUDGE HAYNES

JOINT MOTION TO CONTINUE STATUS CONFERENCE
TO FINALIZE SETTLEMENT NEGOTIATIONS

Hevesi
Mummahon
MURKAWED
Lell
Wolcott

COMES NOW Petitioner Deanna Wolcott, by and through her attorney, Howard L. Upchurch, jointly with agreement of the United States, and hereby moves this court for a continuance of the status conference currently set for December 14, 2012. The parties request a continuance of one month to finalize negotiations. In support thereof, Deanna Wolcott has recently withdrawn her petition to the personality and vehicles, and therefore the only remaining assets to be disposed of are two real properties. (D.E. 967: Withdrawal). The United States has acknowledged that Ms. Wolcott has an interest in the remaining real property, and the parties are finalizing the exact amount of Ms. Wolcott's interest. These negotiations require the gathering, by Ms. Wolcott, of various financial documents relating to the real property, and the drafting of a final settlement document.

This motion is not submitted for the purpose of delay, but instead to promote efficiency and with a diligent effort toward settlement.